

**UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND
(Northern Division)**

IN RE TITANIUM DIOXIDE
ANTITRUST LITIGATION

Master Docket No. 10-CV-00318 (RDB)

THIS DOCUMENT RELATES TO:
ALL ACTIONS

**STIPULATION AND [PROPOSED] ORDER
REGARDING EXPERT DISCLOSURES**

IT IS HEREBY STIPULATED BY AND AGREED among the parties hereto,
through their undersigned counsel, as follows:

1. Defendants shall serve their Rule 26(a)(2) Expert Designations and Disclosures on or before December 21, 2012, instead of December 7, 2012, as currently contemplated by the Court's Case Schedule Order, dated August 17, 2012 (ECF No. 330) ("Case Schedule").

2. Plaintiffs shall serve their Rebuttal Rule 26(a)(2) Expert Disclosures on or before January 29, 2013, instead of January 15, 2013, as currently contemplated by the Case Schedule. (See id.)

3. The Expert Discovery Deadline shall be March 1, 2013, instead of the current February 15, 2013 deadline contemplated by the Case Schedule. (See id.)

4. All other deadlines set forth in the Case Schedule are not modified and remain in effect.

Respectfully submitted,

Dated: November 30, 2012

GOLD BENNETT CERA AND SIDENER, LLP

By: /s/
Solomon B. Cera

Solomon B. Cera (admitted *pro hac vice*)
scera@gbcslaw.com
C. Andrew Dirksen (admitted *pro hac vice*)
adirksen@gbcslaw.com
GOLD BENNETT CERA AND SIDENER, LLP
595 Market St ., Ste. 2300
San Francisco, CA 94105
Tel: (415) 777-2230
Fax: (415) 777-5189

Co-Lead Counsel

Dated: November 30, 2012

LIEFF, CABRASER, HEIMANN &
BERNSTEIN, LLP

By: /s/
Eric B. Fastiff

Eric B. Fastiff (admitted *pro hac vice*)
efastiff@lchb.com
Daniel M. Hutchinson (admitted *pro hac vice*)
dhutchinson@lchb.com
Eduardo E. Santacana (admitted *pro hac vice*)
esantacana@lchb.com
LIEFF, CABRASER, HEIMANN &
BERNSTEIN, LLP
Embarcadero Center West
275 Battery Street, 29th floor
San Francisco, California 94111-3339
Tel: (415) 956-1000
Fax: (415) 956-1008

Co-Lead Counsel

Dated: November 30, 2012

SAVERI LAW FIRM

By: /s/
Joseph R. Saveri

Joseph R. Saveri (admitted *pro hac vice*)
jsaveri@saverilawfirm.com
Lisa L. Leebove (admitted *pro hac vice*)
lleeboue@saverilawfirm.com
SAVERI LAW FIRM
255 California St., Ste. 450
San Francisco, California 94111
Tel: (415) 500-6800
Fax: (415) 500-6803

Co-Lead Counsel

Dated: November 30, 2012

SHAPIRO SHER GUINOT & SANDLER

By: /s/
Paul M. Sandler

Paul M. Sandler (admitted *pro hac vice*)
pms@shapirosher.com
Robert B. Levin (admitted *pro hac vice*)
rbl@shapirosher.com
SHAPIRO SHER GUINOT & SANDLER
36 South Charles Street, Suite 2000
Baltimore, Maryland 21201
Tel: (410) 385-0202
Fax: (410) 539-7611

Plaintiffs' Liaison Counsel

BERGER & MONTAGUE, P.C.

Eric L. Cramer (admitted *pro hac vice*)
ecramer@bm.net
Michael C. Dell'Angelo (admitted *pro hac vice*)
mdellangelo@bm.net
Daniel Walker (admitted *pro hac vice*)
dwalker@bm.net
Matthew P. McCahill (admitted *pro hac vice*)
mmccahill@bm.net
BERGER & MONTAGUE, P.C.
1622 Locust Street
Philadelphia, Pennsylvania 19103
Tel: (215) 875-3000
Fax: (415) 875-4604

Plaintiffs' Executive Committee

GRANT & EISENHOFER, P.A.

Linda Nussbaum (admitted *pro hac vice*)
lnussbaum@gelaw.com
GRANT & EISENHOFER, P.A.
485 Lexington Avenue
New York, NY 10017
Tel: (646) 722-8500
Fax: (646) 722-8501

Plaintiffs' Executive Committee

Dated: November 30, 2012

CROWELL & MORING LLP

By: /s/ Shari Ross Lahlou
Shari Ross Lahlou

Kent A. Gardiner (admitted *pro hac vice*)
kgardiner@crowell.com
Shari Ross Lahlou (16570)
slahlou@crowell.com
John Luke Cuddihy (16075)
jcuddihy@crowell.com
Lucy Grace Noyola (admitted *pro hac vice*)
lnoyola@crowell.com
CROWELL & MORING LLP
1001 Pennsylvania Avenue, N.W.
Washington, D.C. 20004-2595
Telephone: (202) 624-2500
Facsimile: (202) 628-5116

CRAVATH, SWAINE & MOORE LLP

Evan R. Chesler (admitted *pro hac vice*)
echesler@cravath.com
Darin P. McAtee (admitted *pro hac vice*)
dmcatee@cravath.com
Timothy G. Cameron (admitted *pro hac vice*)
tcameron@cravath.com
CRAVATH, SWAINE & MOORE LLP
Worldwide Plaza
825 8th Avenue
New York, NY 10019-7475
Telephone: (212) 474-1000
Facsimile: (212) 474-3700

Attorneys for Defendant
E. I. du Pont de Nemours and Company

Dated: November 30, 2012

ARNOLD and PORTER LLP

By: /s/ Ryan Z. Watts
Ryan Z. Watts

James L. Cooper (admitted *pro hac vice*)
james.cooper@aporter.com
Ryan Z. Watts (admitted *pro hac vice*)
ryan.watts@aporter.com
Justin P. Hedge (admitted *pro hac vice*)
justin.hedge@aporter.com
Andrew Treaster (admitted *pro hac vice*)
andrew.treaster@aporter.com
ARNOLD and PORTER LLP
555 Twelfth Street NW
Washington, D.C. 20004
Telephone: (202) 942-5000
Facsimile: (202) 942-5999

Attorneys for Defendant Cristal USA Inc.

Dated: November 30, 2012

VINSON & ELKINS LLP

By: /s/ James A. Reeder, Jr.
James A. Reeder, Jr.

David T. Harvin (admitted *pro hac vice*)
dharvin@velaw.com
James A. Reeder, Jr. (admitted *pro hac vice*)
jreeder@velaw.com
Erica T. Krennerich (admitted *pro hac vice*)
ekrennerich@velaw.com
VINSON & ELKINS LLP
1001 Fannin Street, Suite 2500
Houston, TX 77002-6760
Telephone: (713) 758-2368
Facsimile: (713) 615-5269

RAY QUINNEY & NEBEKER PC

Justin T. Toth (admitted *pro hac vice*)

jtoth@rqn.com

Ray Quinney & Nebeker PC

36 S. State Street, Suite 1400

Salt Lake City, UT 84111

Telephone: (801) 532-1500

Facsimile: (801) 532-7543

WOMBLE CARLYLE SANDRIDGE AND
RICE PLLC

David B. Hamilton (04308)

david.hamilton@wcsr.com

Womble Carlyle Sandridge and Rice PLLC

250 W. Pratt Street, Suite 1300

Baltimore, MD 21201

Telephone: (410) 545-5850

Facsimile: (410) 545-5801

*Attorneys for Defendant Huntsman
International LLC*

Dated: November 30, 2012

LOCKE LORD LLP

By: /s/ Kelly R. Vickers
Kelly R. Vickers

Paul Edward Coggins (admitted *pro hac vice*)

pcoggins@lockelord.com

Kelly R. Vickers (admitted *pro hac vice*)

kvickers@lockelord.com

LOCKE LORD LLP

2200 Ross Avenue, Suite 2200

Dallas, Texas 75201

Telephone: (214) 740-8000

Facsimile: (214) 740-8800

Attorneys for Defendant Kronos Worldwide Inc.

SO ORDERED:

Dated: December __, 2012

Richard D. Bennett
United States District Judge